

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:

TRINITY GUARDION, INC.,

Debtor.

Case No. 22-90227-AKM-11

CHAPTER 11

JOINDER IN OBJECTION TO MOTION FOR
RELIEF FROM STAY AND LIQUIDATE CLAIM

Trinity Guardion Investments LLC and TGuardion Investments LLC join in the Debtor's *Objection to Motion for Relief from Stay and Liquidate Claim* [Doc. 49]. Trinity Guardion Investments LLC and TGuardion Investments LLC will be prejudiced by a determination outside of bankruptcy on Movant's theory that Debtor is the alter ego of Downey + Rippe, LLC. The Illinois state court will not take into account the ramifications on Debtor's secured creditors, investors, and equity holders, as those parties are not before the state court. Those parties, however, are before this Court and view this Court as the appropriate forum to consider the implications of decisions – like the treatment of Movant's potential claims – on Debtor, the Estate, its creditors, and equity holders.

After the claims bar date and the filing of a plan, this Court will be in a better position to determine the process for addressing any claims asserted by Movant. The Motion should be denied, or held in abeyance pending the filing of claims and a Subchapter V plan of reorganization in this proceeding.

April 15, 2022

Respectfully submitted,

/s/ Brian R. Pollock

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and TGuardion Investments LLC

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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/s/ Brian R. Pollock

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